# IN THE UNITED STATES DISTRICT COURT

# FOR THE NORTHERN DISTRICT OF TEXAS

# **DALLAS DIVISION**

UNITED STATES OF AMERICA	<b>§</b>	
VS.	§ §	CRIMINAL NO. 3:16-cr-00472-N
GARY MICHAEL BEACH	§ §	

# **DEFENDANT GARY BEACH'S EXHIBIT LIST**

COMES NOW the Defendant, by and through his attorneys of record, MARTIN LENOIR and MICHAEL MOWLA, and files his Exhibit List for trial scheduled on February 12, 2018.

Defendant adopts in whole any and all exhibits listed on Government's Exhibit List that has been filed in this cause.

# Defendant's Exhibit:

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
1.	Beach 2010 Trust		
2.	Participation Agreement		
3.	Articles of Organization. Beach Petroleum L.L.C.		
4.	Limited Liability Company Charter Beach Petroleum L.L.C.		
5.	Assignment of Participation Agreement		
6.	Richard Dafoe Grand Jury Testimony 03/22/16		
7.	Richard Dafoe Grand Jury Testimony 04/20/16		
8.	Richard Dafoe Grand Jury Testimony 09/20/16		

**DEFENDANT GARY BEACH'S EXHIBIT LIST** - Page 1

9.	Letter to David Elmquist
10.	Email from Diane Reed
11.	Email from Richard Dafoe to Gary Beach 09/20/11 at 2:12 PM Email from Gary Beach to Richard Dafoe 09/20/11 at 1:35 PM
12.	Email from Gary Beach to Richard Dafoe 12/02/11 at 8:43 AM Email from Robert Theriot to Richard Dafoe 12/02/11 at 12:33 PM Email from Gary Beach to Robert Theriot 12/01/11 at 11:13 AM
13.	Email from Richard Dafoe to Gary Beach 12/05/11 at 8:42 AM Email from Gary Beach to Richard Dafoe 12/02/11 at 8:09 AM
14.	Email from Gary Beach to Richard Dafoe 01/11/12 at 3:35 PM
15.	Email from Gary Beach to Jennifer White 12/01/11 at 9:49 AM Email from Gary Beach to Richard Dafoe 11/30/11 at 11:41 AM Email from Robert Theriot to Gary Beach 11/30/11 at 10:47 AM
16.	Email from Gary Beach to Jennifer White 11/30/11 at 5:28 PM Email from Jennifer White to Gary Beach 11/30/11 at 5:22 PM Email from Gary Beach to Jennifer White 11/30/11 at 5:22 PM
17.	Email from Gary Beach to Richard Dafoe 11/20/11 at 1:35 PM
18.	Email from Gary Beach to Richard Dafoe 11/30/11 at 11:40 AM Email from Robert Theriot to Gary Beach 11/30/11 at 10:47 AM
19.	Email from Gary Beach to Jennifer White 11/30/11 at 12:55 PM

20.	Email from Gary Beach to Jennifer White 11/30/11 at 1:11 PM
21.	Email from Gary Beach to Jennifer White 11/30/11 at 1:15 PM
22.	Email from Gary Beach to Jennifer White 11/30/11 at 1:22 PM
23.	Email from Gary Beach to Jennifer White 11/30/11 at 2:03 PM Email from Jennifer White to Gary Beach 11/30/11 at 1:33 PM Email from Gary Beach to Jennifer White 11/30/11 at 1:28 PM
24.	Email from Gary Beach to Jennifer White 11/30/11 at 5:28 PM Email from Jennifer White to Gary Beach 11/30/11 at 5:22 PM Email From Gary Beach to Jennifer White 11/30/11 at 5:22 PM
25.	Email from Richard Dafoe to Gary Beach 12/05/11 at 8:42 AM Email from Gary Beach to Richard Dafoe 12/05/11 at 8:09 AM
26.	Email from Gary Beach to Jennifer White 11/30/11 at 12:55 PM
27.	Email from Richard Dafoe to Gary Beach 08/05/11 at 10:32 AM
28.	Email from Richard Dafoe to Gary Beach 08/05/11 at 12:05 PM Email from Gary Beach to Richard Dafoe 08/05/11 at 12:03 PM
29.	Email from Gary Beach to Richard Dafoe 08/05/11 at 6:59 PM Email from Richard Leshin to Gary Beach 08/05/11 at 4:30 PM
30.	Email from Richard Dafoe to Gary Beach 08/25/11 at 11:08 AM Email from Gary Beach to Richard Dafoe 08/25/11 at 9:22 AM

31.	Email from Gary Beach to Richard Dafoe 08/25/11 at 2:18 PM Email from Richard Dafoe to Gary Beach 08/25/11 at 2:11 PM
32.	Email from Richard Dafoe to Gary Beach 09/19/11 at 9:34 AM Email from Gary Beach to Richard Dafoe 09/19/11 at 9:17 AM
33.	Email from Richard Dafoe to Gary Beach 09/19/11 at 3:06 PM Email from Gary Beach to Richard Dafoe 09/19/11 at 2:34 PM
34.	Email from Richard Dafoe to Gary Beach 10/18/11 at 9:42 AM Email from Gary Beach to Richard Dafoe 10/18/11 at 9:40 AM
35.	Email from Richard Dafoe to Gary Beach 11/09/11 at 8:46 AM Email from Gary Beach to Richard Dafoe 11/09/11 at 8:46 AM Email from Robert Theriot to Gary Beach 11/07/11 at 9:28 AM
36.	Email from Gary Beach to Jennifer White 11/30/11 at 2:03 PM Email from Jennifer White to Gary Beach 11/30/11 at 1:33 PM Email from Gary Beach to Jennifer White 11/30/11 at 1:28 PM
37.	Email from Jennifer White to Gary Beach 11/30/11 at 5:22 PM Email from Gary Beach to Jennifer White 11/30/11 at 5:22 PM
38.	Email from Richard Dafoe to Gary Beach 12/02/11 at 4:08 PM
39.	Email from Richard Dafoe to Gary Beach 12/05/11 at 8:42 AM Email from Gary Beach to Richard Dafoe 12/05/11 at 8:09 AM

40.	Email from Richard Dafoe to Gary Beach 12/14/11 at 5:36 PM Email from Gary Beach to Richard Dafoe 12/14/11 at 5:31 PM
41.	Email from Gary Beach to Richard Dafoe 12/14/11 at 5:44 PM Email from Richard Dafoe to Gary Beach 12/14/11 at 5:42 PM Email from Gary Beach to Richard Dafoe 12/14/11 at 5:40 PM Email from Richard Dafoe to Gary Beach 12/14/11 at 5:37 PM Email from Gary Beach to Richard Dafoe 12/14/11 at 5:38 PM Email from Richard Dafoe to Gary Beach 12/14/11 at 5:36 PM Email from Gary Beach to Richard Dafoe 12/14/11 at 5:31 PM
42.	Email from Richard Dafoe to Gary Beach 12/19/11 at 8:54 AM Email from Gary Beach to Richard Dafoe 12/19/11 at 8:46 AM
43.	Email from Richard Dafoe to Gary Beach 12/19/11 at 9:27 AM Email from Gary Beach to Richard Dafoe 12/19/11 at 9:08 AM Email from Richard Dafoe to Gary Beach 12/19/11 at 8:54 AM Email from Gary Beach to Richard Dafoe 12/19/11 at 8:46 AM

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44.	Email from Gary Beach to Richard Dafoe 12/19/11 at 10:05 AM Email from Richard Dafoe to Gary Beach 12/19/11 at 9:58 AM Email from Gary Beach to Richard Dafoe 12/19/11 at 9:37 AM Email from Richard Dafoe to Gary Beach 12/19/11 at 9:27 AM Email from Gary Beach to Richard Dafoe 12/19/11 at 9:08 AM Email from Richard Dafoe to Gary Beach 12/19/11 at 8:54 AM Email from Gary Beach to Richard Dafoe 12/19/11 at 8:46 AM	
45.	Email from Gary Beach to Richard Dafoe 01/02/12 at 9:48 AM	
46.	Email from Gary Beach to Richard Dafoe 01/02/12 at 9:50 AM	
47.	Email from Gary Beach to Richard Dafoe 01/02/12 at 11:28 AM	
48.	Email from Richard Dafoe to Gary Beach 01/09/12 at 8:39 AM Email from Gary Beach to Richard Dafoe 01/09/12 at 8:01 AM	
49.	Email from Gary Beach to Richard Dafoe 01/09/12 at 9:45 AM Email from Richard Dafoe to Gary Beach 01/09/12 at 8:39 AM Email from Gary Beach to Richard Dafoe 01/09/12 at 8:01 AM	
50.	Email from Richard Dafoe to Gary Beach 02/17/12 at 12:36 PM	
51.	Letter to Richard Dafoe from Nancy Resnick	
52.	Letter to Nancy Resnick from Richard Dafoe	
53.	Rule 9011	
54.	Beach Capital Partnership, L.P. Statements 01/2011 to 09/2011	

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55.	Checks on Beach Capital Partnerships, L.P. 12/2010 to 07/2011	
56.	Gentry Beach Gary Beach Statements 01/2012 to 01/2013	
57.	Gary M. Beach Bank Statements 12/2010 to 09/2011	
58.	Beach Petroleum LLC Statements 07/2011 to 12/2012	
59.	Gary & Marcy Beach Individual Tax Return 2011	
60.	Gary & Marcy Beach Individual Tax Return 2012	
61.	Beach 2010 Trust Tax Return 2011	
62.	Beach 2010 Trust Tax Return 2012	
63.	Beach Capital Partnership LP Tax Return 2011	
64.	Beach Capital Partnership LP Tax Return 2012	
65.	Herndon, Plant, and Oakley Statements 08/2011 and 09/2011	
66.	Herndon, Plant, and Oakley wiring instructions and incoming wire confirmation	
67.	Email from Gary Beach to Jeff Gentry with invoice attached 05/27/11 at 10:36 AM	
68.	Email from Gary Beach to Jeff Gentry with invoice attached 06/16/11 at 9:34 AM	
69.	Email from Gary Beach to Jeff Gentry with invoice attached 07/05/11 at 11:20 AM	

70.	Email from Gary Beach to Jeff Gentry with invoice attached 08/12/11 at 3:00 PM
71.	Email from Gary Beach to Jeff Gentry with invoice attached 08/15/11 at 9:47 AM
72.	Email from Gary Beach to Jeff Gentry with invoice attached 09/21/11 at 12:42 PM
73.	Email from Gary Beach to Jeff Gentry with wiring instructions 10/18/11 at 9:32 AM
74.	Email from Gary Beach to Jeff Gentry with invoice attached 11/18/11 at 2:51 PM
75.	Email from Gary Beach to Jeff Gentry with invoice attached 12/09/11 at 4:09 PM
76.	Email from Gary Beach to Jeff Gentry with invoice attached 01/11/12 at 11:51 AM
77.	Email from Gary Beach to Jeff Gentry with invoice attached 01/27/12 at 2:42 PM
78.	Email from Gary Beach to Jeff Gentry with invoice attached 03/07/12 at 12:01 PM
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87.	Email from Gary Beach to Jeff Gentry with invoice attached 11/29/12 at 10:11 AM
88.	Email from Gary Beach to Jeff Gentry 07/27/11 at 9:22 AM
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113.	Email from Gary Beach to Jeff Gentry 02/27/12 at 4:15 PM
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115.	Email from Gary Beach to Jeff Gentry 02/28/12 at 5:05 PM
116.	Email from Gary Beach to Jeff Gentry 03/01/12 at 11:22 AM
117.	Email from Gary Beach to Jeff Gentry 03/01/12 at 11:26 AM Email from William Basham to Gary Beach 02/29/12 at 4:44 PM
118.	Email from Gary Beach to Jeff Gentry 03/06/12 at 4:59 PM
119.	Email from Gary Beach to Jeff Gentry 03/15/12 at 12:13 PM
120.	Email from Gary Beach to Jeff Gentry 03/14/12 at 8:34 AM
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123.	Email from Gary Beach to Jeff Gentry 06/07/11 at 10:04 AM
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127.	Email from Gary Beach to Jeff Gentry 06/22/11 at 10:49 AM Email from John Melancon to Gary Beach 06/20/11 at 1:18 PM	
128.	Email from Gary Beach to Jeff Gentry 06/23/11 at 4:35 PM	
129.	Email from Gary Beach to Gary Challburg 07/05/11 at 11:05 AM	
130.	Email from Gary Beach to Jeff Gentry 07/12/11 at 3:04 PM	
131.	Email from Gary Beach to Jeff Gentry 09/19/11 at 11:37 AM Email from Angela Benedict to Gary Beach 09/19/11 at 10:59 AM	
132.	Email from Gary Beach to Jeff Gentry 10/31/11 at 8:44 AM Email from Angela Benedict to Gary Beach 10/28/11 at 10:37 AM	
133.	Email from Gary Beach to Jeff Gentry 11/09/11 at 9:01 AM Email from Angela Benedict to Gary Beach 11/08/11 at 2:33 PM	
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136.	Email from Gary Beach to Jeff Gentry 12/19/11 at 2:50 PM Email from Angela Benedict to Gary Beach 12/19/11 at 2:14 PM	
137.	BLANK	
138.	Bayou Bouillon Field Development Project St. Martin and Iberville Parishes, LA	
139.	Bayou Bouillon Field Development Project St. Martin and Iberville Parishes, LA	
140.	Jury Charge & Instructions Beach Capital, et al v. Deeprock Venture Partners, LP, et al	
141.	Invoices to Beach Capital Partnership	
142.	Indictment filed 11/01/16	
143.	Indictment filed 03/07/17	
144.	Indictment filed 07/12/17	
145.	Indictment filed 07/25/17	
146.	Indictment filed 09/26/17	
147.	Indictment filed 12/20/17	
148.	Form for Statement of Financial Affairs for Individuals Filing for Bankruptcy	
149.	Email from Richard Dafoe to David Drez 07/28/16 at 4:53 PM	
150.	Letter from Jay Dewald to Mark Vincent 08/03/16	
151.	Email from Gary Beach to Phuc Phan 09/25/12 at 9:29 AM	
152.	Email from Gary Beach to Phuc Phan 08/29/12 at 1:13 PM	
153.	Email from Gary Beach to Phuc Tran 09/16/12 at 10:05 AM	

Respectfully submitted,

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### ATTORNEYS FOR DEFENDANT

# **CERTIFICATE OF SERVICE**

I hereby certify that on the 5th day of February, 2018 electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Mr. David L Jarvis Assistant United States Attorney United States Attorney's Office 1100 Commerce Street, Third Floor Dallas, Texas 75242 david.jarvis@usdoj.gov Mr. Walt Junker Assistant United States Attorney United States Attorney's Office 1100 Commerce Street, Third Floor Dallas, Texas 75242 walt.junker@usdoj.gov

/s/ MARTIN LENOIR MARTIN LENOIR